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VIA ELECTRONIC MAIL - PDF

September 9, 2005

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Re: Genereux, et al. v. American Beryllia Corp., et al.,
USDC, CA No. 04-12137-JLT

Dear Counsel:

This letter is intended to serve as the plaintiffs' automatic required disclosure of information now reasonably available to the plaintiffs made pursuant to Fed. R. Civ. P. 26(a)(1) and L.R. 26.2. Please note that plaintiffs' more detailed disclosure of medical information pursuant to L.R. 35.1 was separately made by letter dated February 1, 2005.

Fed. R. Civ. P. 26(a)(1)(A)

Based on information now reasonably available, the plaintiffs identify the following as individuals likely to have discoverable information that the plaintiffs may use to support their claims (excluding persons expected to be called to testify solely for impeachment):

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PLAINTIFFS

1. Suzanne Genereux
10 Fry Pond Road
West Greenwich, RI
2. Barry Genereux
10 Fry Pond Road
West Greenwich, RI
3. Angela Genereux (minor)
10 Fry Pond Road
West Greenwich, RI
4. Krista Genereux (minor)
10 Fry Pond Road
West Greenwich, RI

MEDICAL AND HEALTHCARE PROVIDERS

1. Lee S. Newman, M.D.
National Jewish Medical and Research Center
1400 Jackson Street
Denver, CO 80206
(303) 270-2375
2. Edward Fernandez, M.D. (radiologist)
Occupational and Environmental Medicine Clinic
3. Tilak Verma, M.D. (respiratory/pulmonary, 1982-1997)
Landmark Medical Center
115 Cass Avenue
Woonsocket, RI 02895
(401) 769-4100
4. BBI-North American Clinical Laboratories (lab results)
75 North Mountain Road
New Britain, CT 06053-3478
(800) 866-6254

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5. PathLab, Inc. (lab results)
195 Hanover St.
P.O. Box 4070
Portsmouth, NH 03801
(800) 258-1441
6. Landmark Medical Center (spirometry, respiratory care)
115 Cass Ave
Woonsocket, RI 02895
(401) 769-4100
7. Dr. Tilak Verma - Medical Director
Lung Diseases and Respiratory Care, Inc.
175 Nate Whipple Highway - Suite 101
Cumberland, RI 02864
(401) 658-2539
8. Alice E. Bonatati, M.D. and
Richard P. Millman, M.D.
Sleep Disorders Center of Lifespan Hospitals
593 Eddy St.
Providence, RI 02903
(401) 444-4148
9. Rhode Island Hospital (lung perfusion study)
Department of Diagnostic Imaging
593 Eddy Street
Providence, RI 02903
10. Sand Lake Hospital (emergency room)
Orlando Regional Healthcare
1414 Kuhl Avenue
Orlando, FL 32806
(321) 841-5111
11. Vanguard / Denmarks Home Med Equip. (wheelchairs, oxygen, equipment, etc.)
155 Jefferson Boulevard
Warwick, RI 02888
(401)-468-1300

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12. David W. Ashley, M.D. (lung and respiratory care, x-rays)
University Medicine Foundation
Family Medicine
1351 South County Trail - Suite 301
East Greenwich, RI 02818
(401) 398-0860
13. Kent County Hospital (DME, equipment)
455 Tollgate Road
Warwick, RI 02886
(401) 737-7000
14. Dr. William M. Corrao, 12/12/02 (lung and respiratory care)
University Pulmonary & Asthma Center
1285 South County Trail
East Greenwich, RI 02818
(401) 886-7910
15. Clayton D.. Lanphear, III, D.O., 7/2/93 (primary care physician)
1133 Main St. - P.O. Box Q
Chepachet, RI 02814
16. James P. McCormick, M.D., (lung and respiratory care)
University Pulmonary & Asthma Center
1377 South County Trail
East Greenwich, RI 02818
(401) 886-7699

DEFENDANTS

_____ **American Beryllia Corp.** The following managers or employees of American Beryllia Corporation ("ABC") are reasonably believed to have discoverable information that the plaintiffs may use to support their claims. Personal identities, addresses and phone numbers are unknown but are believed to be in the custody, possession or control of ABC. Subjects of information, if not self-evident by title, are set forth in parentheses following each title.

1. Director or Manager of Sales (or equivalent position) of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts);
2. Director or Manager of Safety and Health (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others);

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3. Director or Manager of Environmental Controls or Regulation (or equivalent position) relating to environmental handling, transport and control over beryllium or beryllium-containing products);
4. Director or Manager of Customer Support (or equivalent position) relating to the purchase, sale, transport and/or use of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts); and
5. Director or Manager of Training (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others).

Brush Wellman, Inc. The following managers or employees of Brush Wellman, Inc. ("Brush") are reasonably believed to have discoverable information that the plaintiffs may use to support their claims. Personal identities, addresses and phone numbers are unknown but are believed to be in the custody, possession or control of Brush. Subjects of information, if not self-evident by title, are set forth in parentheses following each title.

1. Director or Manager of Sales (or equivalent position) of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts);
2. Director or Manager of Safety and Health (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others);
3. Director or Manager of Environmental Controls or Regulation (or equivalent position) relating to environmental handling, transport and control over beryllium or beryllium-containing products);
4. Director or Manager of Customer Support (or equivalent position) relating to the purchase, sale, transport and/or use of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts); and
5. Director or Manager of Training (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others).

Hardric Laboratories, Inc. The following managers or employees of Hardric Laboratories, Inc. ("Hardric") are reasonably believed to have discoverable information that the plaintiffs may use to support their claims. Personal identities, addresses and phone numbers are

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unknown but are believed to be in the custody, possession or control of Hardric. Subjects of information, if not self-evident by title, are set forth in parentheses following each title.

1. Director or Manager of Sales (or equivalent position) of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts);
2. Director or Manager of Safety and Health (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others);
3. Director or Manager of Environmental Controls or Regulation (or equivalent position) relating to environmental handling, transport and control over beryllium or beryllium-containing products);
4. Director or Manager of Customer Support (or equivalent position) relating to the purchase, sale, transport and/or use of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts); and
5. Director or Manager of Training (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others).

 Kyocera America, Inc. and Kyocera Industrial Ceramics Corp. The following managers or employees of Kyocera America, Inc. ("Kyocera") and/or Kyocera Industrial Ceramics Corp. ("KICC") are reasonably believed to have discoverable information that the plaintiffs may use to support their claims. Personal identities, addresses and phone numbers are unknown but are believed to be in the custody, possession or control of Kyocera and/or KICC. Subjects of information, if not self-evident by title, are set forth in parentheses following each title.

1. Director or Manager of Sales (or equivalent position) of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts);
2. Director or Manager of Safety and Health (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others);
3. Director or Manager of Environmental Controls or Regulation (or equivalent position) relating to environmental handling, transport and control over beryllium or beryllium-containing products);

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4. Director or Manager of Customer Support (or equivalent position) relating to the purchase, sale, transport and/or use of beryllium and/or beryllium-containing products in or to entities located in the region that includes Massachusetts); and
5. Director or Manager of Training (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others).

Raytheon Co. The following managers or employees (current or former) of Raytheon Co. ("Raytheon") are reasonably believed to have discoverable information that the plaintiffs may use to support their claims. Personal identities, addresses and phone numbers are generally unknown but are believed to be in the custody, possession or control of Raytheon. Subjects of information, if not self-evident by title, are set forth in parentheses following each title.

1. Director or Manager of Purchasing (or equivalent position) of beryllium and/or beryllium-containing products for the Raytheon's Waltham, MA facility);
2. Director or Manager of Safety and Health (or equivalent position) relating to personnel handling or fabricating beryllium or beryllium-containing products and safety measures relating to such products at Raytheon's Waltham, MA facility);
3. Director of Medical Services (or equivalent position) relating to medical services and/or information provided to Raytheon personnel handling or fabricating beryllium or beryllium-containing products at Raytheon's Waltham, MA facility);
4. Director or Manager of Environmental Controls or Regulation (or equivalent position) relating to environmental handling, transport and control over beryllium or beryllium-containing products at Raytheon's Waltham, MA facility);
5. Director or Manager of Training (or equivalent position) relating to personnel manufacturing and/or handling beryllium or beryllium-containing products and safety measures relating to such products by customers and others).
6. Frank Balint (former Raytheon Waltham facility employee and spouse of same)
14 Eastview Drive - Unit 36
Wilton, NH 03086
(603) 654-4049
7. Claire Balint (former Raytheon Waltham facility employee and spouse of same)
14 Eastview Drive - Unit 36
Wilton, NH 03086
(603) 654-4049

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8. Robert F. Barberio
374 Island Pond Rd.
Derry, NH 03038
(603) 893-6548
9. Ernest Bettuchy (former Raytheon Waltham facility employee)
62 Cliff St.
Quincy, MA 02168
(617) 472-4967
10. Steven Chadwick (former Raytheon Waltham facility employee)
11 Beaver Terrace Cir. (believed to be last known address)
Framingham, MA
11. Stanley Lichwala (former Raytheon Waltham facility employee)
12 Clara Rd.
Framingham, MA 01701
(508) 561-4312

Fed. R. Civ. P. 26(a)(1)(B)

Based on information now reasonably available, the plaintiffs identify the following documents or categories of documents (all or most of which have already been produced) in the possession, custody or control of her attorneys at Meehan, Boyle, Black & Fitzgerald, Two Center Plaza - Sixth Floor, Boston, MA 02108 and/or Golomb & Honik, P.C., 121 S. Broad Street, Ninth Floor, Philadelphia, PA 19107 which the plaintiffs may use to support her claims (excluding documents expected to be used solely for impeachment) in this matter:

National Jewish Medical and Research Center
Reports of Lee S. Newman, M.D.: 4/21/04
BeLPT: 6/23/01, 2/5/02, 8/27/02, Invoices 6/22/01, 2/4/02

Occupational and Environmental Medicine Clinic records: 8/26/02-8/29/02
(9/26/02 summary), 8/30/02 (revised) - pathology report, transbronchial/endobronchial biopsies; 8/26/02 CAT scan; 8/26/02 PFT; Labs; Invoices
E. Fernandez, radiologist, 8/26/02

Tilak Verma, M.D. records
Landmark Medical Center records (Progress Notes: 3/1/88 - 11/12/97)

Lab results from BBI-North American Clinical Laboratories, PathLab, Inc., Landmark Medical Center (chest x-rays - 10/27/96, 10/13/89; H&P: 10/27/96; Spirometry: 1/31/97;

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Tilak Verma, M.D. records, Lung Diseases and Respiratory Care, Inc. (5/20/97 - Emergency Dept. records including chest x-ray; 6/5/97 myocardial perfusion study; 4/30/97-abdominal x-ray; EOBs (Dr. Verma) - 8/16/89, 9/5/89, 11/14/89, 1/23/97, 1/31/97, 7/9/97 and 11/12/97 EOBs (Landmark Medical Center): 5/20/97, 6/3/97, 6/19/97, 4/14, 4/30, 5/29, 7/16, 1/31, 9/8/97)

Alice E. Bonatati, M.D. and Richard P. Millman, M.D.
Sleep Disorders Center (Reports: 2/28/03, 3/21/03)

Rhode Island Hospital (9/25/98 - lung perfusion study)

Sand Lake Hospital (Records: 6/3/96)

Vanguard/Denmarks Home Med Equip. (records re: wheelchairs, oxygen, and other equipment)

David W. Ashley, M.D. (Records: 6/10/99-10/5/04; 5/27/04 chest x-ray report)

Kent County Hospital (records re: DME, equip., 2/27/97)

Dr. William M. Corrao (records: 12/12/02)

C. D. Lanphear, III, D.O. (primary care physician; patient chart)

Dr. J. McCormick (records of 4/9/03 and 3/20/03)

records relating to other handicapped equipment including vehicle, power chairs, etc.

wage and federal income tax records of Suzanne Genereux

Plaintiffs reserve their right to supplement and/or amend these disclosures as an when appropriate as the litigation proceeds.

Fed. R. Civ. P. 26(a)(1)(B)

Insofar as plaintiffs' Amended Complaint primarily alleges a variety of claims from separate plaintiffs seeking both compensatory and punitive damages, the categories of damages are not easily subject to computation. Nevertheless, plaintiffs submit that an initial computation of Suzanne Genereux's medical bills relating to her condition were submitted in her L.R. 35.1 Disclosures on February 1, 2005 and that the documents in support thereof are contained in the medical bills disclosed above and which are expected in the future. Plaintiff expects net economic loss of earning capacity resulting from her condition based on available wage and federal income tax returns as the usual labor, health and life tables and statistics typically utilized

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by economists in such analyses. Future medical expenses are expected to be computed as necessary by medical, rehabilitation and/or occupational specialists as part of plaintiffs' expert disclosures but have not been undertaken to date. Plaintiffs have not attempted to sets forth computations for such categories of recovery as lost care, comfort, society, pain and suffering, punitive damages, etc.

Naturally, plaintiffs reserve their right to supplement and/or amend these disclosures as an when appropriate as the litigation proceeds.

Please feel free to call if you have questions regarding these disclosures.

Very truly yours,

Bradley M. Henry